



July 29, 2013

Mr. Paul Gildersleeve, P.E.  
Solid Waste Management Bureau  
New Hampshire Department of Environmental Services  
PO Box 95, 29 Hazen Drive  
Concord, NH 03302-0095

Re: Response to Review Comments  
Standard Permit Application  
New England Metal Recycling LLC  
Madbury, New Hampshire  
WMD Log #2011610, 2011660, 2011730 and 10779

Dear Mr. Gildersleeve:

This letter presents our responses to comments provided in your July 30, 2012 letter regarding our application for a Standard Permit for our facility on Knox Marsh Road (Route 155) in Madbury. Comments from your letter are provided below in italics, followed by our response in standard type. We have attached the portions of the application documents that have been modified in response to the comments, with all master documents updated accordingly. Modified text is indicated in redline/strikeout mode to facilitate your review.

#### **Design Report**

- 1. While response #1 under Design Report states that berms will protect the site from the 100-year flood, these berms are not shown on the site plan. Please show the extent of the existing berms and proposed additions to these berms, and explain how these berms will protect the site from the 100-year flood, per Env-Sw 1002.05(b).*

**Response:** The drawing, Site Layout, Drawing No. 1 has been revised to show the existing earthen berms and proposed additions to these berms. A revised copy of Site Layout, Drawing No. 1 is attached.

The berms will protect the site from the infiltration of water in the event of a 100-year flood event by establishing a barrier approximately 5-8 feet in height along the Northern perimeter of the site, and between the existing elevations identified as "Approximate Flood Zone (Zone A)" and the proposed operating area and eastern side of the facility entrance drive. Berms will not necessary on the western side of the facility or entrance drive as the natural conditions of the site increase significantly in elevation from the existing grade and facility entrance drive in a westerly direction to Pudding Hill Road.

**Schnitzer Steel Industries, Inc.**  
Metals Recycling Business – Northeast Region  
69 Rover Street, Everett, MA 02149

### **Operating Plan**

1. *In the response to Operating Plan, comment 1, it is stated that ELV's will be crushed on site in an automobile crusher or tin logger; however, no crusher or tin logger could be found on the site plans. Please explain.*

**Response:** The location of the proposed automobile crusher/tin logger was inadvertently omitted from the site plan drawings; however, Site Layout, Drawing No. 1 has been revised to show the location of the automobile crusher/tin logger if the proposed unit is installed. A revised copy of Site Layout, Drawing No. 1 is attached.

2. *Please place the response to Operating Plan, comment 2, which addresses the operating outside the timeframe of 6AM-6PM, in Section 3.1 of the Operating Plan. Please show on the site plans the location of the primary gate (located on the frontage of Knox Marsh Road).*

**Response:** Section 3.1 of the Operating Plan has been revised to include our response to Operating Plan, comment 2 from our response letter of July 16, 2012. A copy of the revised Section 3.1 of the Operating Plan is attached.

The drawing, Site Layout, Drawing No. 1 has been revised to show the location of primary gate (located on the frontage of Knox Marsh Road). A revised copy of Site Layout, Drawing No. 1 is attached.

3. *While Section 3.1 of the Closure Plan was submitted to add ELVs as a separate line item, Section 2.1 of the Operating Plan was not included. Please explain.*

**Response:** Section 2.1 of the Operating Plan was revised on July 12, 2012 as requested in the NHDES comment letter of December 29, 2011 (Cost Estimate, comment 2); however this section was inadvertently omitted from our response letter of July 16, 2012. A copy of Section 2.1 of the Operating Plan is attached.

4. *In Attachment 3, Page 1, Bullet Points 3, 4, 9 and 11 directly relate to items found in an ELV. However, these bullet points list wastes that are brought in separately from an ELV. Please include a statement in the section "The following materials will NOT be accepted at our facility" explaining whether or not these items apply to "wet" or "dry" vehicle dismantling, or are wastes that are brought in separately.*

**Response:** Attachment 3, Page 1, Bullet Points 3, 4, 9 and 11 have been revised to clarify the concerns as addressed in this comment. A revised copy of Attachment 3, Page 1 is attached.

5. *In Attachment 3, Page 2, section "Automobiles/Light Trucks," please add a statement that the ELVs will be processed in accordance with the Best Management Practices as discussed in the Motor Vehicle Salvage Yard Environmental Compliance Manual & Self-Audit Checklist.*

Mr. Paul Gildersleeve  
New Hampshire Department of Environmental Services  
July 29, 2013  
Page 3 of 3

**Response:** Attachment 3, Page 2, section "Automobiles/Light Trucks," has been revised to include a statement indicating that ELVs will be processed in accordance with the Best Management Practices as discussed in the Motor Vehicle Salvage Yard Environmental Compliance Manual & Self-Audit Checklist. A revised copy of Attachment 3, Page 2 is attached.

6. *In Attachment 2, Page 2, section "Metal Theft," please describe how the facility prevents vehicle theft through the use of processing of State End-of-Life Forms, Titles/Bill of Sales and NMVTIS.*

**Response:** Attachment 2, Page 2 the following statement has been added to describe how the facility prevents vehicle theft through the use of processing of State End-of-Life Forms, Titles/Bills of Sales and NMVTIS.

"Per State of New Hampshire requirement, the purchase/acceptance of Automobiles/Light Trucks/ELVs requires the completion and submission of a State of New Hampshire Junk Vehicle End-of-Life Form (TDMV13A) by the owner of the vehicle for all vehicles purchased, and the transfer of ownership/surrender of a Motor Vehicle Title for any vehicle purchased that is 15 years old or newer. Completed forms/titles are submitted to the State of New Hampshire, and VIN numbers are reported to the National Motor Vehicle Title Information System (NMVTIS) for validation of ownership and retire of VIN numbers."

A revised copy of Attachment 2, Page 2 is attached.

We believe these responses address your comments as indicated in your letter of July 30, 2012, however, if you should have further questions or require additional information, please feel free to contact Keri Fitzpatrick at [kfitzpatrick@schn.com](mailto:kfitzpatrick@schn.com) or (781) 706-7003.

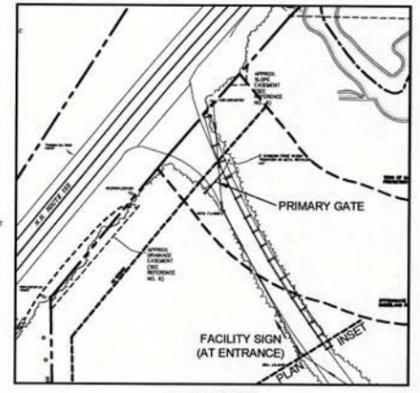
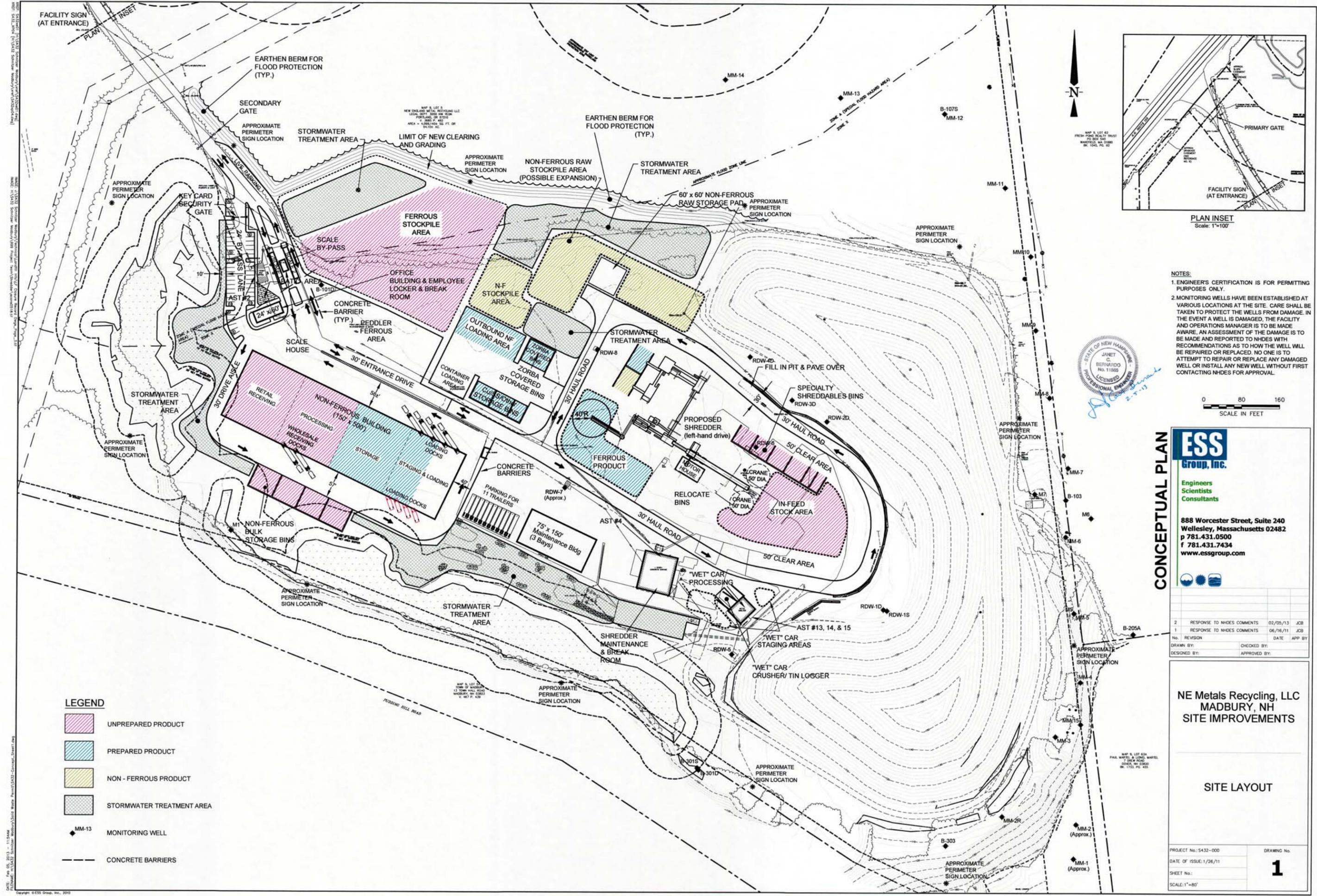
Sincerely,



Keri Fitzpatrick  
Regional Environmental Manager

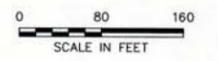
cc: Pat Christopher, Schnitzer Steel Industries, Inc.  
Kitty Cornwell, Town of Madbury  
J. Michael Joyal, City of Dover  
S. Shillaber, PE, Sanborn Head & Associates  
Barry Keith, B.H. Keith Associates  
Janet Bernardo, ESS Group, Inc.  
Wayne Wheeler, PE, WMD-Solid Waste Bureau

## **DRAWINGS**



PLAN INSET  
Scale: 1"=100'

NOTES:  
 1. ENGINEER'S CERTIFICATION IS FOR PERMITTING PURPOSES ONLY.  
 2. MONITORING WELLS HAVE BEEN ESTABLISHED AT VARIOUS LOCATIONS AT THE SITE. CARE SHALL BE TAKEN TO PROTECT THE WELLS FROM DAMAGE. IN THE EVENT A WELL IS DAMAGED, THE FACILITY AND OPERATIONS MANAGER IS TO BE MADE AWARE, AN ASSESSMENT OF THE DAMAGE IS TO BE MADE AND REPORTED TO NHDES WITH RECOMMENDATIONS AS TO HOW THE WELL WILL BE REPAIRED OR REPLACED. NO ONE IS TO ATTEMPT TO REPAIR OR REPLACE ANY DAMAGED WELL OR INSTALL ANY NEW WELL WITHOUT FIRST CONTACTING NHDES FOR APPROVAL.



CONCEPTUAL PLAN



Engineers  
Scientists  
Consultants

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 Wellesey, Massachusetts 02482  
 p 781.431.0500  
 f 781.431.7434  
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2	RESPONSE TO NHDES COMMENTS	02/05/13	JCB
1	RESPONSE TO NHDES COMMENTS	06/16/11	JCB
No.	REVISION	DATE	APP BY
DESIGNED BY:	CHECKED BY:	APPROVED BY:	

NE Metals Recycling, LLC  
 MADBURY, NH  
 SITE IMPROVEMENTS

SITE LAYOUT

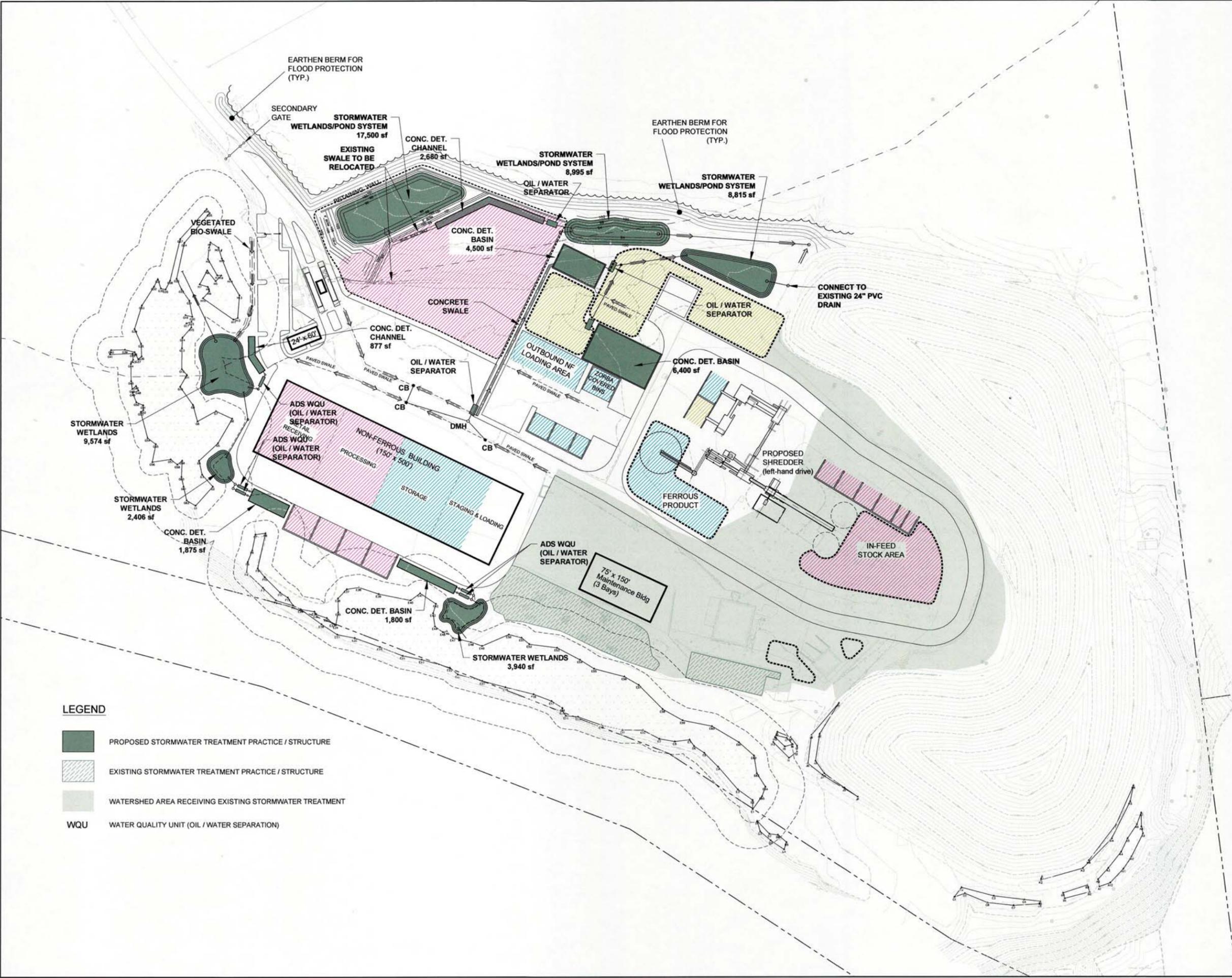
PROJECT No.: 5432-000	DRAWING No.
DATE OF ISSUE: 1/26/11	<b>1</b>
SHEET No.:	
SCALE: 1"=80'	

**LEGEND**

	UNPREPARED PRODUCT
	PREPARED PRODUCT
	NON-FERROUS PRODUCT
	STORMWATER TREATMENT AREA
	MONITORING WELL
	CONCRETE BARRIERS

DATE: Feb 05, 2013 - 11:56AM  
 C:\Users\jcb\Documents\Projects\5432-000\Drawings\5432-000-01-01-01.dwg  
 Copyright © ESS Group, Inc., 2013

DATE: 04/05/2013 11:01 AM  
 PROJECT: NE Metals Recycling, LLC - Madbury, NH - Site Improvements - Conceptual Drainage Plan  
 DRAWING: 1/26/11  
 SHEET: 2  
 SCALE: 1"=80'  
 PROJECT No.: 5432-000  
 DRAWING No.: 2  
 DATE OF ISSUE: 1/26/11  
 SHEET No.:  
 SCALE: 1"=80'  
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- LEGEND**
- PROPOSED STORMWATER TREATMENT PRACTICE / STRUCTURE
  - EXISTING STORMWATER TREATMENT PRACTICE / STRUCTURE
  - WATERSHED AREA RECEIVING EXISTING STORMWATER TREATMENT
  - WQU** WATER QUALITY UNIT (OIL / WATER SEPARATION)



NOTE: ENGINEER'S CERTIFICATION IS FOR PERMITTING PURPOSES ONLY.



**CONCEPTUAL PLAN**

**ESS Group, Inc.**  
 Engineers  
 Scientists  
 Consultants

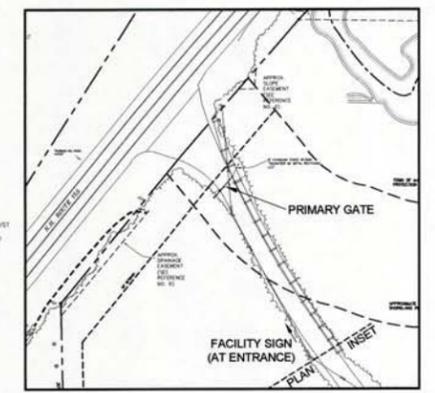
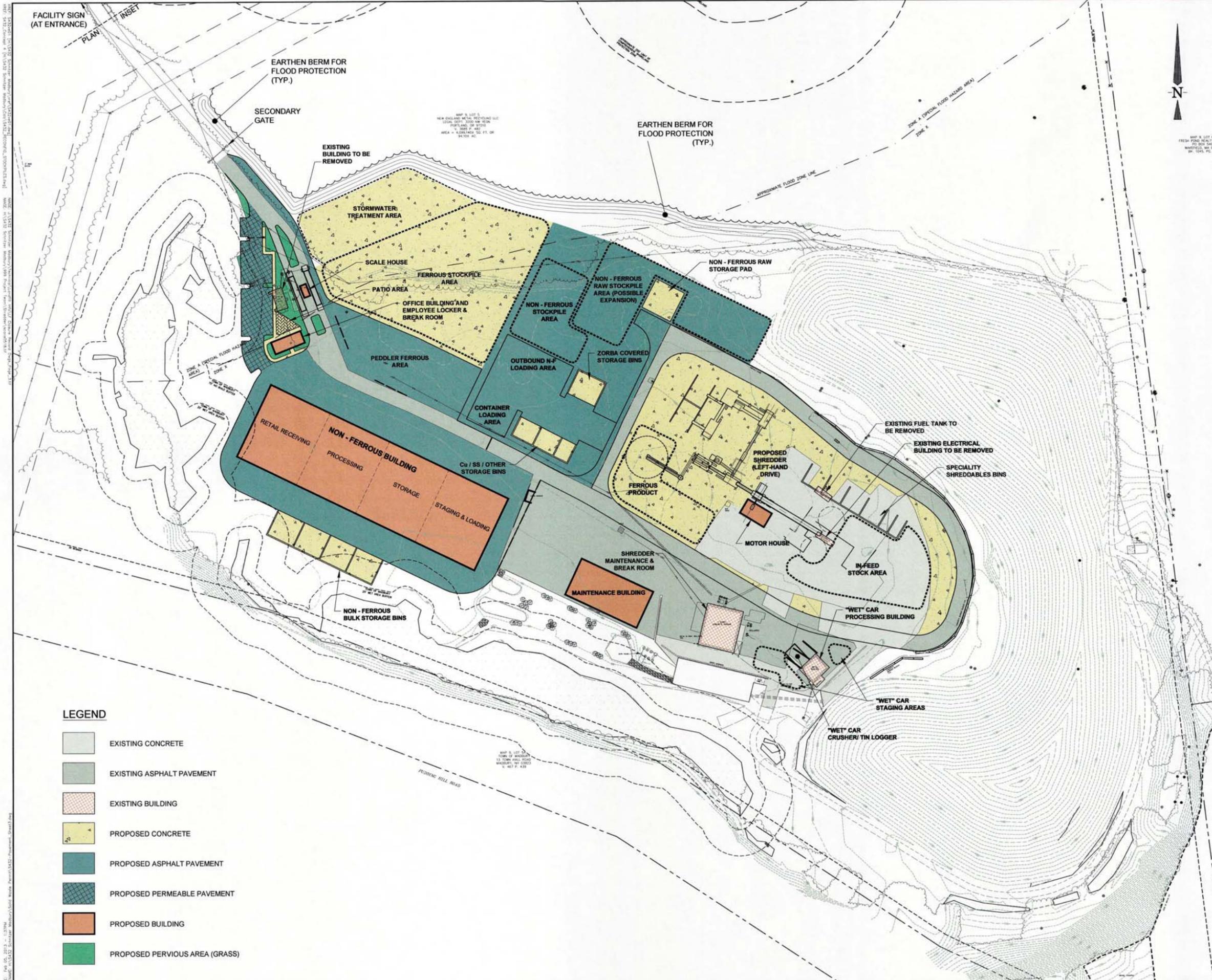
888 Worcester Street, Suite 240  
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1	RESPONSE TO INHES COMMENTS	02/05/13	JCB
No.	REVISION	DATE	APP BY
DESIGNED BY:	CHECKED BY:	APPROVED BY:	

**NE Metals Recycling, LLC  
 MADBURY, NH  
 SITE IMPROVEMENTS**

**CONCEPTUAL  
 DRAINAGE PLAN**

PROJECT No.: 5432-000	DRAWING No.
DATE OF ISSUE: 1/26/11	<b>2</b>
SHEET No.:	
SCALE: 1"=80'	



PLAN INSET  
Scale: 1"=100'



NOTE: ENGINEER'S CERTIFICATION IS FOR PERMITTING PURPOSES ONLY.



CONCEPTUAL PLAN



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1	RESPONSE TO NHDES COMMENTS	02/05/13	JCB
No.	REVISION	DATE	APP BY
DRAWN BY:		CHECKED BY:	
DESIGNED BY:		APPROVED BY:	

**NE Metals Recycling, LLC  
MADBURY, NH  
SITE IMPROVEMENTS**

**PROPOSED  
PAVEMENT AREAS  
PLAN**

PROJECT No: 5432-000	DRAWING No:
DATE OF ISSUE: 1/26/11	<b>3</b>
SHEET No:	
SCALE: 1"=80'	

**LEGEND**

- EXISTING CONCRETE
- EXISTING ASPHALT PAVEMENT
- EXISTING BUILDING
- PROPOSED CONCRETE
- PROPOSED ASPHALT PAVEMENT
- PROPOSED PERMEABLE PAVEMENT
- PROPOSED BUILDING
- PROPOSED PERVIOUS AREA (GRASS)

DATE: JAN 05, 2013 11:37AM  
DRAWN BY: JCB  
CHECKED BY: JCB  
APPROVED BY: JCB  
PROJECT: 5432-000  
SHEET: 3  
SCALE: 1"=80'

**REVISED SECTION 3.1 OF THE  
SOLID WASTE PERMIT APPLICATION (OPERATING PLAN)**

### **3.0 ROUTINE OPERATIONS PLAN**

#### **3.1 Operating Hours**

The facility operates between the hours of 6:00 am and 11:00 pm, Monday through Friday, and 6:00 am to 12:00 pm, Saturday.

The facility accepts deliveries between the hours of 7:00 am and 4:00 pm Monday through Friday, and 7:00 am to 12:00 pm, Saturday, unless special arrangements have been made in advance with the Facility Operator. Activities which occur outside of the time when the facility may accept deliveries consist of maintenance of equipment and vehicles. Performing maintenance outside of the time the facility is receiving materials reduces the risk to persons performing maintenance and allows for maintenance to be performed as scheduled.

New England Metal Recycling LLC has an extensive Health and Safety, and Environmental program consisting of: written policies and standard operating procedures, introductory and ongoing training for all personnel, personal protective equipment (PPE), certification of equipment operators, daily/weekly safety toolbox talks, monthly safety committee meetings, and a progressive discipline policy for all employees. After hours activities will be conducted in accordance with the Company's written Health and Safety and Environmental requirements by teams of personnel; [each team will be comprised of (a minimum) crew of two persons.] Operating in teams minimizes the safety risk to personnel, as well as, provides for oversight of all activities. Stationary and portable lighting will also be provided to ensure personnel are able to perform activities with adequate lighting in assigned work areas during times of low light/visibility or inclement weather.

Access control to the site during the hours in which the facility will not be accepting deliveries will be restricted as defined in Section 3.2 of the Operating Plan, and by means of securing a primary gate (located on the frontage of Knox Marsh Road) as well as a secondary gate (on the roadway within the confines of the facility).

After hours activities will be conducted in manner as to not create a nuisance as defined by NHDES or local requirements. Complaints made by abutters or other third parties shall be maintained in a log within in the Operations Manual. Complaints made by abutters or other third parties that involve operating conditions or practices having the potential to adversely affect human health, safety, or the environment or which involve a recurring or persistent nuisance situation shall be reported to the NHDES in writing.

#### **3.2 Access Control & On-Site Traffic Patterns**

Unauthorized entry to and unauthorized use of the facility is prohibited by restricting access to the facility and the activities of the general public while within the facility.

Public access to the facility is via the driveway on Knox Marsh Road. The driveway is secured by a locked gate when the Facility Operator is not present. When the gate is open, all traffic must stop at the scale house or office building, so that all entry to the facility is monitored; permitting access to authorized parties only.

**REVISED SECTION 2.1 OF THE  
SOLID WASTE PERMIT APPLICATION (OPERATING PLAN)**

## 2.0 AUTHORIZED AND PROHIBITED WASTE

### 2.1 Authorized Waste

The following materials are authorized for receipt and processing at the facility:

Ferrous scrap metals consisting of iron, steel and cast iron in various forms, such as:

- A. Prepared Steel – Material of a certain size, thickness and quality requirement to be described as commodity grade prepared scrap. This material requires no further processing
- B. Unprepared Steel – Material of miscellaneous size, thickness and quality requiring processing (shearing, cutting, baling, etc) into prepared steel (above)
- C. Mixed Steel – Material of miscellaneous size, thickness and quality requiring sorting and processing to create a marketable ferrous material
- D. Cast iron materials consisting of, but not limited to; boilers, radiators, obsolete machinery, etc., that are not steel
- E. Light iron – Material consisting of light gauge steel, white goods, appliances, roofing material and other sheet steel items generated from households, industrial sources, transfer stations and municipal solid waste
- F. Automobiles, and and obsolete vehicles and end of life vehicles (ELV's)
- G. Obsolete machinery and other equipment generally from manufacturing operations

Non-Ferrous scrap materials including:

- A. Aluminum
- B. Brass
- C. Copper
- D. Lead and Lead Acid Batteries
- E. Stainless Steel and High Temperature Alloys
- F. Catalytic Convertors
- G. Any other non-ferrous recyclable materials that have value

[End-of-Life Vehicles \(ELVs\) \[may contain residual wastes \(fluids, refrigerant and mercury switches\)\]](#)

### 2.2 Prohibited Waste

The following items are prohibited for processing at the facility:

- A. Hazardous material and hazardous waste
- B. Sludge and septage material
- C. Contained gaseous material
- D. Infectious material
- E. Explosives or explosive materials

\* Refer to the following attachments for scrap acceptance guidelines and prohibited items. Attachment 1 – General Scrap Acceptance Guidelines; Attachment 2 - Shredder In-feed Guidelines; Attachment 3 - Guidelines for Iron and Steel Scrap.

**REVISED ATTACHMENT 3, PAGE 1**



## **Iron and Steel Scrap Acceptance Guidelines**

This document clarifies our general guidelines for accepting iron and steel scrap. These requirements reflect our commitment to responsible environmental management.

Please be aware that many of our guidelines are controlled by state and federal environmental regulations which apply both to us and our suppliers.

This list is not inclusive; other items not listed may be inappropriate for recycling as scrap metal. Please read these guidelines carefully and contact your supervisor or buyer if you have questions about specific items.

**Remember that any load may be rejected at the supplier's expense if these guidelines are not followed.**

### **The following materials will NOT be accepted at our facility:**

- Refrigerants (including CFCs and HCFCs) in refrigerators and air conditioners. Please note that Clean Air Act regulations (§608(b)(1) and (§608(c)) prohibit any release of refrigerants to the atmosphere, and require persons handling refrigerants to follow specific procedures. Our suppliers are required to sign a statement certifying that all refrigerants have been properly removed (40 CFR §82).
- Asbestos or asbestos containing materials, such as pipe insulation, acetylene tanks and surfacing material commonly found on I-beams, tanks, and other structural and demolition debris (40 CFR §61.150).
- Oils, gasoline, other petroleum products and antifreeze, [with the exception of residual quantities that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle](#). This includes hydraulic fluids, gear oils and grease. Hydraulic equipment must have hydraulic hoses removed and cylinders cut open and drained.
- Lead-acid or NiCad batteries or battery parts, including automobile batteries (40 CFR §273), unless sold as a separate commodity (lead-acid batteries) [or contained within an ELV purchased as a "wet" vehicle](#) for recycling.
- Items that contain or have contained PCBs, including small capacitors, fluorescent light ballasts and electrical transformers or transformer components and paint (TSCA and 40 CFR §258 and §258). Transformers and transformer components may be accepted if properly drained and documented as "certified clean."
- Paint cans or other paint containers.
- Fluorescent lights, neon, high intensity mercury vapor lights, high pressure sodium, metal halide and associated ballasts.
- Circuit boards (unless sold as electronic scrap).
- Any material containing hazardous or toxic substances, [with the exception of residual quantities of gasoline, petroleum products and anti-freeze that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle](#).
- Military scrap of any kind, unless approved in advance.
- Explosives or explosive residues, [with the exception of residual quantities of gasoline and petroleum products that may be contained within a vehicle or piece of equipment, or limited quantities as may be contained within an ELV purchased as a "wet" vehicle](#).
- Radioactive material of any kind.
- Tires, wood, dirt, yard debris, concrete, asphalt, glass, rubber, or other non-metallic materials.
- Computers, televisions, computer monitors, CRT, LCD. (Computers may be accepted if previously approved for purchase as electronic scrap)

**REVISED ATTACHMENT 3, PAGE 2**



The following items will be accepted ONLY if prepared as described:

- Appliances: ALL fluids, including refrigerants, must be drained.
- Automobiles/Light Trucks: Refer to Shredder In-Feed Guidelines. Vehicles containing fluids may only be accepted if sold and processed as a “wet car.”
- Air conditioning compressors: MUST be removed from item, cut in half, and drained
- Drums, barrels and other containers: MUST be thoroughly cleaned and the entire top removed and open for inspection. Gas cylinders, including air bottles, propane and other gas tanks, must be cut in half.
- Storage tanks must be clean and purged of all fluids/gases, as well as, free of plastic, fiberglass or asbestos coatings/liners. Tanks that held hazardous chemicals must be certified clean and free of hazardous material by competent authority. We must be able to inspect the inside of tanks; therefore all tanks must have the access panel removed or a “basketball” sized section removed for inspection purposes.
- Cable and wire: Must be cut in 3-foot lengths, or coiled and banded with ¾ inch steel banding in at least four (4) places.
- Chain-link fencing: Must be cut in sections no larger than 18 feet by 4 feet.
- Aerosol cans: MUST be empty and crushed or punctured. Plastic caps must be removed.

### **Automobiles/Light Trucks**

All vehicles shall be drained of air conditioning refrigerant, mercury switches and fluids. The battery and battery terminal connectors must be removed, and automobiles may not contain heavy scrap, excess dirt, wire rope, steel cable, fencing, large balls of wire or other non-shreddable items. Please refer to Schnitzer’s Shredder In-feed Guidelines for a complete listing of acceptance requirements. [Automobiles/Light Trucks accepted as ELVs will be processed in accordance with the Best Management Practices as discussed in the New Hampshire DES Motor Vehicle Salvage Yard Environmental Compliance Manual & Self-Audit Checklist.](#)

### **Light Iron**

Light metal 1/8 inch and under in thickness - (includes items such as lawn mowers, bicycles, swing sets, water heaters, tin sheds, metal shelving, steel desks, appliances, etc.). Appliances must be free from all capacitors, CFC’s and HCFC’s. We will not accept refrigerators or air conditioners unless they have been properly drained of refrigerant, with all capacitors removed. No microwaves, computers, televisions or other household electronics. Please refer to Schnitzer’s Shredder In-feed Guidelines for a complete listing of acceptance requirements.

### **Motor Blocks**

Automobile and light truck motors from which steel and non-ferrous fittings may or may not be removed. Motor Blocks shall be drained of all fluids and free of drive shafts, frame parts, hoses or excessive contaminants. We will not accept large motors from heavy equipment, large trucks or marine equipment unless approved in advance.

### **#1 HMS, Prepared**

Wrought iron and/or steel scrap, ¼ inch and over in thickness. Individual pieces may not exceed 60 x 18 inches in size and must be prepared in a manner to insure compact charging. (Material exceeding one inch in thickness may not exceed 36 x 24 inches in size.) May not include automobile/light truck body scrap, galvanized material, sheet iron or thin-gauged material. Gas cylinders, including air bottles, propane and other gaseous tanks, must be cut in half.

**REVISED ATTACHMENT 2, PAGE 2**



### **Preparation Required for Vehicles**

**All vehicles shall be drained of air conditioning refrigerant, mercury switches and fluids. The battery and battery terminal connectors must be removed, and automobiles may not contain heavy scrap, excess dirt, tires, wire rope, steel cable, fencing, large balls of wire or other non-shreddable items.**

For the locations that accept "wet" or end of life vehicles, air conditioning refrigerant, mercury switches and fluids will be accepted in quantities up to the vehicles manufacturer's specifications; however, vehicles may not be leaking refrigerant or fluids upon arrival.

All flattened and semi-flattened cars must be color-coded. If your load is not color-coded your trucks could experience delays at our yard while we inspect your load. No load will be allowed over our scale without a color code, unless the load can be inspected prior to your departure from our yard.

**WE RESERVE THE RIGHT, AT OUR DISCRETION, TO REJECT, PROPERLY REMOVE OR DISPOSE OF ANY PROHIBITED ITEMS AT THE SUPPLIER'S EXPENSE.**

### **Metal Theft**

In an effort to curtail the rising incidence of metal theft, Schnitzer Steel's operations refuse to accept the following materials unless ownership is clearly established:

- New production scrap or new materials that are part of a manufacturing process that are being sold by an individual, not a company.
- Items used only by governments, utilities, railroads or for very specific purposes. This includes guardrails, manhole covers, storm drain covers and grates, certain cables used only in high voltage transmission lines, historic markers, cemetery plaques and artwork.
- Full-sized, new materials such as those used in construction, or equipment tools used by contractors.
- Materials that may not be new, but are clearly suspect, such as bleachers from an athletic field or traffic signs.
- Beer kegs, soda cylinders and shopping carts.
- End-of-life vehicles from an unknown supplier unless a written record of title is presented.
- [Per State of New Hampshire requirement, the purchase/acceptance of Automobiles/Light Trucks/ELVs requires the completion and submission of a State of New Hampshire Junk Vehicle End-of-Life Form \(TDMV13A\) by the owner of the vehicle for all vehicles purchased, and the transfer of ownership/surrender of a Motor Vehicle Title for any vehicle purchased that is 15 years old or newer. Completed forms/titles are submitted to the State of New Hampshire, and VIN numbers are reported to the National Motor Vehicle Title Information System \(NMVTIS\) for validation of ownership and retire of VIN numbers.](#)
- Materials that have been reported stolen.

Schnitzer Steel maintains records of all transactions and cooperates fully with local, state and federal law enforcement in the prosecution of metal theft.